

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff

vs.

ALCATEL-LUCENT USA, INC.,

Defendant

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**CASE NO. 6:15-CV-00041
(Lead Consolidated Case)**

OPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to the Court's Orders and the scheduling order in this case, the parties have met and conferred at length regarding a Protective Order for this case. The parties agree to and move for the entry of a Protective Order; however, certain provisions remain in dispute regarding the Protective Order. A copy of the proposed Protective Order with the Parties' positions is attached hereto as Exhibit A.

Dated: September 22, 2015

Respectfully submitted,

ADAPTIX, INC.

By: /s/ Paul J. Hayes

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Dated: September 22, 2015

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on this 22nd day of September, 2015.

/s/ Jennifer C. Tempesta
Jennifer C. Tempesta

CERTIFICATE OF CONFERENCE

I hereby certify that the parties have met and conferred at length regarding a Protective Order for this case. The parties agree to and move for the entry of a Protective Order; however, certain sections remain in dispute between the parties regarding certain terms of the Protective Order. As a result, this is an opposed motion.

/s/ Jennifer C. Tempesta
Jennifer C. Tempesta